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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DANIEL ROSENBAUM; RENELDO
RODRIGUEZ; and THOMAS CARON,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

PERMIAN RESOURCES CORP. f/k/a
CENTENNIAL RESOURCE
DEVELOPMENT, INC.; CHESAPEAKE
ENERGY CORPORATION;
CONTINENTAL RESOURCES INC.;
DIAMONDBACK ENERGY, INC.; EOG
RESOURCES, INC.; HESS
CORPORATION; OCCIDENTAL
PETROLEUM CORPORATION; and
PIONEER NATURAL RESOURCES
COMPANY,

Defendants.

CASE NO. 2:24-cv-00103-GMN-MDC

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS TO
RESPOND TO THE COMPLAINT**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Daniel Rosenbaum, Reneldo Rodriguez, and Thomas Caron (together, “Plaintiffs”) and all Defendants in this action, Permian Resources Corp. f/k/a Centennial Resource Development, Inc., Chesapeake Energy Corporation, Continental Resources Inc., Diamondback Energy, Inc., EOG Resources, Inc., Hess Corporation, Occidental Petroleum Corporation, Pioneer Natural Resources Company (together, “Defendants”)¹, by and through their respective counsel and pending the Court’s approval, that Defendants shall have an additional 60 days to answer or otherwise respond to the Complaint (ECF No. 1). Defendants’ original response deadline is February 7, 2024. With an additional 60 days, Defendants’ deadline to answer or otherwise respond to the Complaint is extended to April 8, 2024.

Good cause exists for the extension set forth herein.

First, eight defendants have been named in this action. Defense counsel were only recently retained, and they require additional time to organize themselves, meet and confer with plaintiffs, and streamline any potential motions that may be presented to the Court.

Second, three additional, related actions have been filed against Defendants in this District.² Additional time is warranted so that the parties and the Court may determine whether and which of the other actions filed against Defendants in this District should be coordinated with this action.

Third, the interests of efficiency would be served by allowing the parties sufficient time to meet and confer on a reasonable approach and briefing schedule for any motions to be presented

¹ By entering into this stipulation, none of the Defendants are waiving any of their potential defenses or arguments to this action, including but not limited to those related to personal jurisdiction and venue.

² On January 22, 2024, a complaint was filed against Defendants in *Andrew Caplen Installations LLC et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00150-JCM-DJA; on January 24, 2024, a complaint was filed against Defendants in *These Paws Were Made for Walkin’ LLC v. Permian Resources Corp. et al.*, No. 2:24-cv-00164-GMN-NJK; and on January 29, 2024, a complaint was filed against Defendants in *Courtmanche et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00198. Two notices of related cases have been filed in the instant action (ECF Nos. 20, 23), and a notice of related cases in each: *Andrew Caplen Installations* (ECF No. 10), *These Paws Were Made for Walkin’* (ECF No. 5), and *Courtmanche* (ECF No.10). The parties have indicated they would be amenable to proceeding on this schedule in the event the cases are coordinated for pretrial proceedings.

to the Court in these actions, with the goal of minimizing the number of filings and avoiding duplication.

This is the first extension requested for Defendants to respond to the Complaint and is not made for the purpose of delay.

Dated: January 31, 2024

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11
12 **IT IS SO ORDERED:**

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14

UNITED STATES DISTRICT JUDGE

15 Dated:
